

November 2025

PAX

How trade in **gum arabic** fuels conflict in Sudan



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1. Introduction

This briefing paper provides an overview of the link between trade in gum arabic and the war in Sudan. Gum arabic, or acacia gum, is a natural resin harvested from the sap of acacia trees (*Senegalia senegal* and *Vachellia seyal*). Its water-soluble, multifunctional properties make it indispensable in a wide range of everyday products, from soft drinks and processed foods to medicines, cosmetics, chewing gum, and paints. To date, no natural or synthetic substitute matches its quality. Global production is heavily concentrated in Sub-Saharan Africa, with Sudan at the epicentre. This combination—the lack of alternatives and geographic concentration—means that many industries, including food and beverages, pharmaceuticals, and cosmetics, continue to rely heavily on Sudanese gum arabic.

To date, the conflict has resulted in over 150,000 deaths and the displacement of more than 12 million people (*BBC* 2025; *ICG* 2025). Famine is severe and widespread, and the UN has called it the world's largest humanitarian crisis (*UN News* 2025). The war pits the Sudanese Armed Forces (SAF), led by Abdel Fattah al-Burhan, against the Rapid Support Forces (RSF), a powerful paramilitary group headed by Mohamed Hamdan Dagalo 'Hemedti', whose origins lie in the Janjaweed, the Arab militia that committed genocide against Darfur's non-Arab population in the early 2000s. Both Burhan and Hemedti are under U.S. sanctions for serious human rights violations, including attacks on civilians and widespread displacement (*US Dept. of State* 2025).

Control over lucrative resources is a central element of the conflict economy, as both SAF and RSF have sought to leverage trade for revenue, territorial control, and influence over local populations. Indeed, international media have increasingly reported on the role that valuable commodities such as gold—which accounts for over 50% of Sudan's exports (*Sudan Events* 2025)—play in financing Sudan's war economy. However, gold is not the only commodity that has been captured by the warring parties (*Atar* 2025a). A much larger shadow economy also fuels the conflict at a local level, yet it remains largely unseen and unmentioned by international media outlets and policymakers.

This paper investigates the probability that the gum arabic found in European supermarkets today—in candies, cosmetics, and medicines—has passed through the hands of Sudan's conflict parties, particularly the RSF. Since the outbreak of the war, European and other international markets have continued to import gum arabic from Sudan. Companies claim the gum is imported responsibly and that their trade does not interact with conflict parties. However, as this paper demonstrates, the gum arabic supply chain is—and has historically been—notoriously opaque. Furthermore, the vast majority of Sudan's gum arabic is harvested and traded in RSF-controlled areas.

The aim of this paper is twofold. First, it seeks to raise awareness among consumers, corporate actors, civil society, and policymakers about the widespread use of gum arabic and its connection to the deadly war in Sudan. The atrocities committed by the RSF in El-Fasher in October 2025, which - if substantiated - may constitute war crimes and crimes against humanity, underscore the urgency of such awareness (ICC 2025). Second, it aims to launch a discussion on the role and responsibilities that European processing companies — the main importers of Sudanese gum arabic — can play in making the gum arabic supply chain more transparent, fairer, and ultimately conflict-free. While we recognize that the gum arabic trade supports millions of households in rural Sudan, the international community may never profit from a trade that keeps Sudan's war economy afloat.

Such a discussion is also relevant in light of current legislative developments regarding corporate due diligence obligations at the EU and national levels. The Corporate Sustainability Due Diligence Directive (CSDDD) has been significantly watered down, putting its effectiveness at serious risk. It also significantly weakens the enhanced due diligence requirements for corporate actors operating in conflict-affected areas, limiting obligations to direct suppliers and making enforcement more challenging. Similarly, national legislative processes regarding the due diligence obligations of corporate actors are being halted, as is the case in the Netherlands, or reversed, as is the case in Germany (ECCHR et al. 2025). The gum arabic case shows that even with legislation in place, monitoring and accountability remain challenging.

Methodology

This research paper, which builds on the *Bloomberg* and *Reuters* articles that came out in the Spring of 2025, is the result of desk research and interviews conducted between May and September 2025. Semi-structured interviews were conducted—mostly online—with nine key informants in Africa (including Chad, Uganda, and Kenya) and Europe between April and August 2025. The interviewees were selected to provide a range of perspectives across the gum arabic value chain, including actors from international organisations, academia, the private sector, diaspora networks, and civil society, with particular attention to links with the Sudan conflict. Furthermore, UN reports, government websites, and trade statistics were consulted.

The paper begins with a brief overview of the gum arabic supply chain, including how armed groups—primarily the RSF and, to a lesser extent, the SAF—profit from the trade through looting, extortion, and smuggling. It then explores why oversight of violations is challenging, examining the limitations of existing responsible sourcing schemes and the application of human rights obligations by companies. Throughout, the briefing highlights how international companies and consumers are connected to the trade and the importance of greater transparency and accountability. Finally, it calls on companies to do their part in ensuring the gum arabic supply chain is fairer and more transparent.

2. From tree to product

Gum arabic is an edible gum that has been traded for centuries. It is tasteless, highly soluble, and uniquely versatile, acting as a binder, stabilizer, and thickener. These properties make it irreplaceable in many products, from food and beverages to pharmaceuticals, cosmetics, and paint. Most consumers encounter it daily, often without realizing it, in chocolate bars, candies, soft drinks like Coca-Cola, or dairy products. Its unique functionality and widespread use underpin substantial global demand, closely linking its trade to the economies of producing countries such as Sudan.

The “Gum Arabic Belt”—the region where acacia trees grow—stretches from Somalia to Senegal. Sudan produces two main types of gum arabic: hashab gum, or “hard gum,” from the trunk and branches of *Senegalia senegal*, and talha gum, more brittle and also called “flaky gum,” from *Vachellia seyal*. Sudan, historically a major producer of hashab gum, contrasts with neighbouring countries, such as Chad, Nigeria, Senegal, Mali, Cameroon, and Kenya, which primarily produce talha gum (World Bank 2007).

Before the outbreak of war in April 2023, Sudan was the world’s largest producer and exporter of gum arabic, supplying around 70–80% of global demand. The sector has long been a vital economic lifeline, providing an additional income to roughly 5 million people (about 11% of the population) across 1 million rural households. Gum arabic accounted for approximately 15% of Sudan’s total exports, linking producers to major markets in Europe, Asia, and North America (*Arabnews* 2023; *Le Monde* 2023). According to *Sudan Events* (2024), pre-war exports were valued at around USD 111 million annually, though the *Wall Street Journal* (2024) estimates this figure at closer to USD 183 million.¹ Approximately 70% of Sudan’s gum arabic exports consist of the higher-value hashab gum, with the remaining 30% made up of talha gum

¹ It has proven difficult to find exact numbers for Sudan’s gum arabic export value, even before the war, which shows how opaque the trade is.

(Eltahir et al. 2025). Sudanese gum is highly prized on international markets due to its uniquely high quality, attributed to ideal climatic conditions. Moreover, gum arabic production has been deeply embedded in the local economy for decades, possibly even centuries (Van Dalen 2019).

U.S. sanctions imposed on Sudan in the late 1990s, following its designation as a state sponsor of terrorism, left gum arabic as one of the country's few viable export commodities. It was exempted from the embargo due to its importance for international food and beverage companies, reinforcing Sudan's focus on gum arabic and helping maintain its dominance in global production compared to neighbouring countries (World Bank 2007).



▲ **Photo:** Solidified gum arabic resin from acacia trees, often called the 'Golden Tear of Africa.' (source: Dorrit van Dalen).



▲ **Photo:** Sudanese men harvest gum arabic from acacia trees in North Kordofan (source: Ashraf Shazly / AFP).

3. From farmers to conglomerates

The acacia tree that produces gum arabic is common throughout the *gum arabic belt*, with the gum primarily harvested from *Senegalia senegal* (Kordofan gum or hashab) and *Vachellia seyal* (talha). Harvesting is typically done by smallholder or semi-nomadic farmers who rely on multiple livelihoods, often practice traditional tapping methods, and for whom gum arabic provides an important supplementary income. Women often play a key role in post-harvest processing, such as cleaning, sorting, and packing the gum, which provides them with an important source of income (Van Dalen 2019). Harvesters wound the trees using special tools, producing a liquid gum that solidifies over a few weeks and can then be collected. While some farmers specifically plant the trees, anyone with an acacia on their land can harvest its gum, making traceability and monitoring of harvesting conditions difficult (Kusters et al. 2023).

The Sudanese gum arabic market has historically been characterized by a lack of transparency, state capture, and unequal distribution of wealth, with farmers receiving only a small fraction of the final export value. At the local level, contract farming is common, whereby farmers enter agreements with traders that specify price and quality in advance, sometimes receiving pre-financing or tools, while traders collect and pay for the gum according to the contract. These arrangements offer market access but often leave farmers with limited bargaining power and a small share of the final export value (Elfadul et al. 2020).

At the regional level, intermediary buyers and merchants continue to collect gum from smallholders, perform basic cleaning or pre-sorting, and store it before forwarding it to local auctions or other collection points. Historically, the Gum Arabic Company (GAC), a public company established in 1969, held the exclusive concession to export raw gum arabic from the Sudanese government. During its monopoly, the GAC controlled all exports with the objective of exercising market power internationally and maximizing foreign currency revenue (World Bank 2007; Atar 2025b). To stabilize the domestic market, it also installed a minimum price policy for local auction markets (floor price) and ran domestic development programmes to further boost the trade.²

² In the 1990s and 2000s, the floor price was around 20% of the export price (World Bank 2007).

As a consequence, export was for a long time monopolized by the GAC. Moreover, the GAC worked with a cartel of four international agents. Historically, around 70% of Sudanese gum arabic exports were handled by a small number of international buyers, notably the French Nexira and Alland & Robert, and the German Alfred L. Wolff and Norevo, who continue to be key importers (Resnick et al. 2025). Their dominant positions in the Sudanese market have allowed them to influence purchasing prices, a situation that persists today. In addition to these bulk exports, some European candy and food companies regularly purchased gum directly from GAC, with volumes of up to 5,000 metric tons per year, to meet their specific industrial needs. The remaining 30% of exports continues to be distributed among various smaller buyers across Europe, the Middle East, North America, and parts of Asia, according to available reports (World Bank 2007; UNCTAD 2018).

In 2009, the Sudanese government ended GAC's monopoly, allowing private exporters to participate in the trade.³ Companies such as Afritec, Nopec, Yagoub Group, Gezira Group, and DAL Group became key players, alongside several other Sudanese exporters. Since then, these firms have collected, cleaned, and pre-processed gum from smallholders, supplying European processors directly.

Throughout both the monopoly and liberalized periods, government revenue collection remained layered: local authorities sometimes collected minor levies from harvesters in the production areas, while the central government primarily collected taxes at the point of export or through sales to international buyers via Sudanese intermediaries, rather than taxing gum along the transport routes from the production areas to the ports (UNCTAD 2018).

Size and structure of the trade today

The trade in Sudanese gum remains dominated by a handful of largely European processing companies (Van Dalen 2019). World Bank trade statistics show that in 2022, the EU imported acacia gum (gum arabic) worth about USD 132.3 million, with USD 97.8 million coming from Sudan — of which USD 80.1 million went to France, USD 12.8 million to Germany, and the remaining USD 4.9 million to other EU countries.

A large quantity of Sudanese gum arabic has been shipped to France, where most industrial processing takes place. Nexira S.A. (Rouen), controlled by Dondain Finance and run by Mathieu Dondain, is a global leader responsible for over 40% of the world's processed gum, supplying clients such as Danone and PepsiCo via its Sudanese subsidiary Afritec. Alland & Robert S.A. (Paris/Normandy), owned by Société Développement Produits Afrique and managed by Frédéric Alland, similarly sources Sudanese gum through Nopec and supplies clients including L'Oréal and Farbest Brands. These two firms' long-standing presence in Sudan—navigating successive Khartoum regimes for decades—allowed them to develop extensive supplier networks and, at least until the outbreak of the conflict in April 2023, ensure high-quality sourcing from markets such as El-Obeid in North Kordofan. The smaller Caragum International S.A.S. also maintains partnerships with Sudanese suppliers to secure premium raw material.

In Germany, the main processors of Sudanese gum arabic are Alfred L. Wolff GmbH and Norevo GmbH, both headquartered in Hamburg. These companies handle large-scale import, cleaning, and processing of raw gum, supplying a wide range of European and global clients in the food, beverage, and nutrition sectors. C.E. Roeper GmbH, also based in Hamburg, operates on a smaller scale as a specialized processor, offering additional capacity and niche products such as natural stabilizers and functional powders. Alfred L. Wolff GmbH, part of the global Wolff Group, has decades of experience in sourcing and processing acacia gum, while Norevo GmbH has developed extensive supplier networks and technical expertise to ensure high-quality material for industrial clients.

Other European processors include Kerry Group plc (Tralee, Ireland) and Polygal AG (Märstetten, Switzerland), which import raw gum arabic from Sudan for further processing into functional powders, stabilizers, and specialty ingredients for the food and beverage industry (Nexira and Alland & Robert corporate websites, accessed September 2025; *Africa Intelligence* 2022a/b 2022; *Coherent Market Insights* 2023).

While France and Germany dominate processing, other European countries play smaller but complementary roles. The Netherlands functions mainly as a trading and distribution hub for processed or semi-processed gum arabic destined for the European food industry, with companies such as IMCD, Caldic, and Amstel Products B.V. acting as distributors (CBI and Ministry of Foreign Affairs 2022). Until mid-2023, Rotterdam-

³ The cartel had meant lower prices paid to farmers and caused a decline of gum arabic production and exports (World Bank 2007).



▲ **Photo:** Sudanese workers sort pieces of gum arabic at a factory 20 km north of Khartoum (Khaled Desouki / AFP).

based FOGA Gum also played a direct role in Sudan, collaborating with local factories in Nyala and Khartoum, importing gum arabic, and supporting local production, including processing plants and producer cooperatives (corporate website). These activities were halted following the outbreak of the conflict, as FOGA's Sudanese facilities were burned and looted (interview with CEO of FOGA, May 2023). In 2020, Dutch imports of gum arabic totalled about EUR 5.1 million, reflecting the country's participation in the European gum arabic trade (Eurostat in CBI and Ministry of Foreign Affairs 2022).

4. Looting, tariffs and illicit trade

As the conflict unfolded in Sudan, multiple sources indicate that the gum arabic trade has become deeply entangled with violence and predation by armed actors.

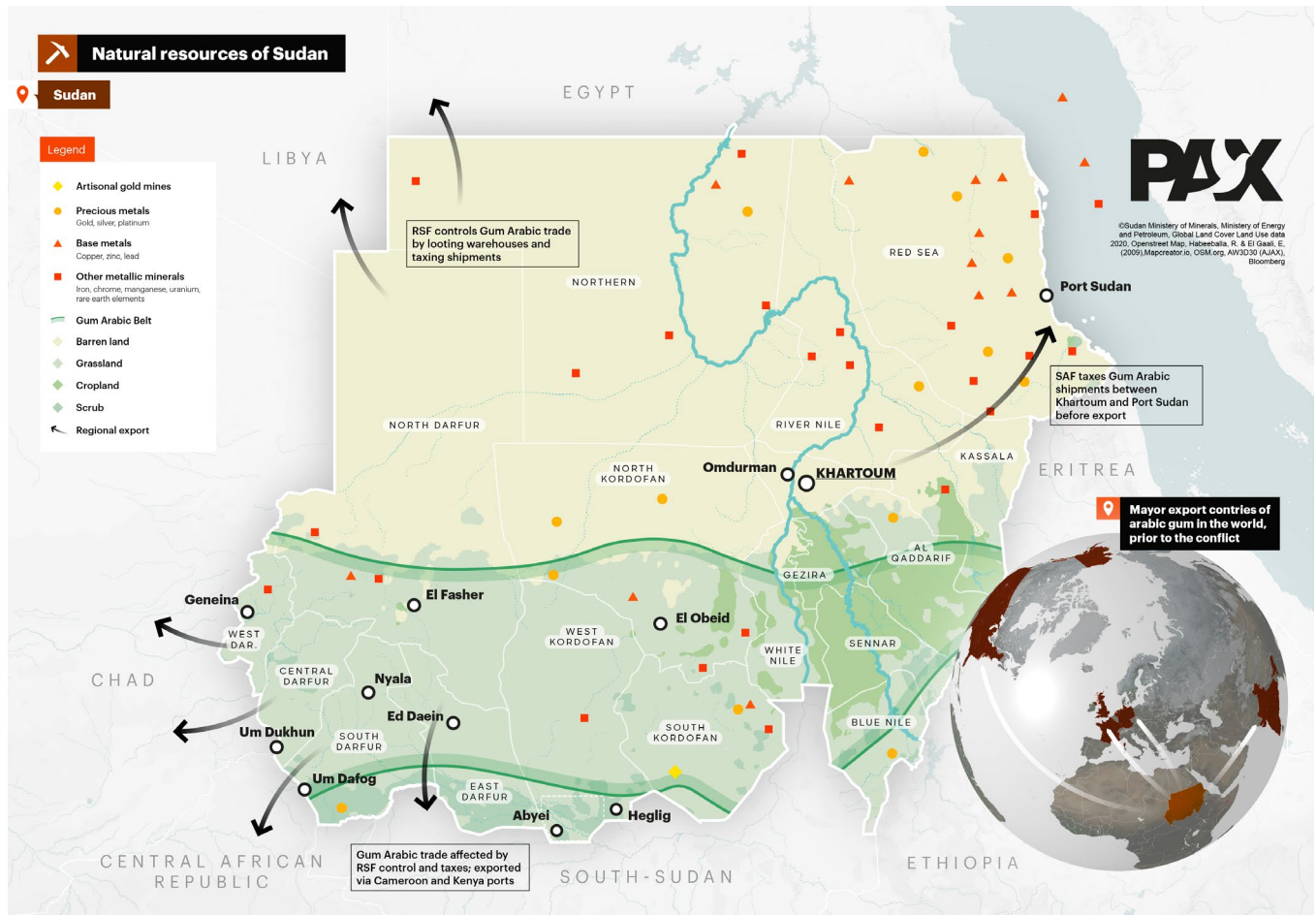
At the start of the war, the RSF and allied militias looted warehouses and burned fields. One trader based in Chad reported that several factories were completely destroyed after the RSF seized the gum arabic stock (interview, May 2025). A representative from Afritec told *Bloomberg* (2025) that the RSF “has burned fields, killed farmers, and looted thousands of metric tons from warehouses in Khartoum — including 3,000 tons from Afritec.” Atar (2005b) reported that a warehouse in Al-Baqir containing hundreds of tons of gum arabic was looted and burned. According to the UN Panel of Experts (2025), local traders from East Darfur and Nyala confirmed that approximately 3,700 tons were stolen between January and June 2024, valued at roughly USD 14.6 million. Additional incidents were reported in Zalingei (West Darfur), Al Mujald (West Kordofan), and El Geneina (West Darfur). Trade associations and UN sources suggest that tens of thousands of tons of gum arabic may have been looted since the onset of the conflict.

The UN Panel of Experts (2025) found that looting was condoned by some RSF commanders as a form of compensation for themselves and their soldiers, to ensure loyalty. A *Reuters* (2025) report quotes an RSF representative claiming that the force had protected the gum arabic trade and only collected small fees, adding that reports of lawbreaking were propaganda against the paramilitary group. The Panel, however, reported that by October 2024, fees were being imposed in RSF-controlled areas in Darfur and Kordofan, according to various informants, including former RSF combatants and local monitors — a finding confirmed by interviews with Sudanese sources consulted for this paper. These fees reportedly amounted to SDG 1 million (≈ USD 513) per truck carrying a 20-ton load, alongside a *zakat* (Islamic charitable contribution) of SDG 100,000 (≈ USD 51) per truck.

Interviews with Sudanese sources confirm that armed militias are imposing illicit levies on the gum arabic trade. Professor Tarig Mahmoud of Kordofan University told the PAX research team that these unofficial charges along trade routes have risen sharply since the outbreak of the war (interview, T. Mahmoud, May 2025).

He added:

“The taxes go to armed thugs in the streets, and if you don’t pay, you can lose your goods—or even your life.”



▲ **Figure:** Map showing key gum arabic production and trade areas alongside major smuggling routes and known border crossings (situation in May 2025).

Similarly, a senior manager from a Khartoum-based trading company told *Bloomberg* (2025): “You have to pay a lot of money to the Janjaweed... They stop the trucks and you have to pay for the trucks to move. They either steal some of it or they make you pay.” He said he routinely paid around USD 2,500 per truck. During the same period, Sudan’s army introduced additional loading costs, export duties, and taxes totalling roughly USD 155 per 100 kg of gum arabic at Port Sudan, as confirmed by a commercial advisor from one of the major packing factories (*Bloomberg* 2025).

These overlapping fees and extortion appear to have incentivized traders to move gum arabic across borders into Chad, Egypt, and South Sudan, with secondary flows extending toward Libya, the Central African Republic, Eritrea, and onward through the port of Douala in Cameroon (*Reuters* 2025; Atar (2005b); interview with a Sudanese trader in Chad, May 2025). Some smuggling routes predated the conflict along the western (Darfur) and southern borders and were later institutionalized by RSF-affiliated networks (*FD* 2023; Atar 2025b). A founder of a Khartoum-based trading company told *Reuters* (2025) that “smugglers manage

to smuggle gum arabic through the RSF because the RSF controls all production areas,” highlighting how armed actors managed to shape and exploit these cross-border flows.

By late 2024, RSF-affiliated gum was already being traded through fully institutionalized informal border markets, through which trucks carry the gum to neighbouring countries, from where it is taken to ports for shipment. In West Kordofan, traders collected gum from Sudanese landowners and sold it to South Sudanese buyers, while in Darfur it was directed toward Egypt, Libya, and other regional destinations (*Reuters* 2025). Kenya’s Port of Mombasa has also emerged as a crucial transit point in the illicit export of gum arabic (*Kenyans* 2025).

The conflict appears to have intensified these dynamics during the 2024/2025 harvest season (October 2024–May 2025). The looting in May of Al-Nahud, West Kordofan—a strategic gum arabic hub linking RSF-held western areas and army-held eastern regions—provides one example of these disruptions. Traders told reporters that around a third of the gum arabic cultivated that

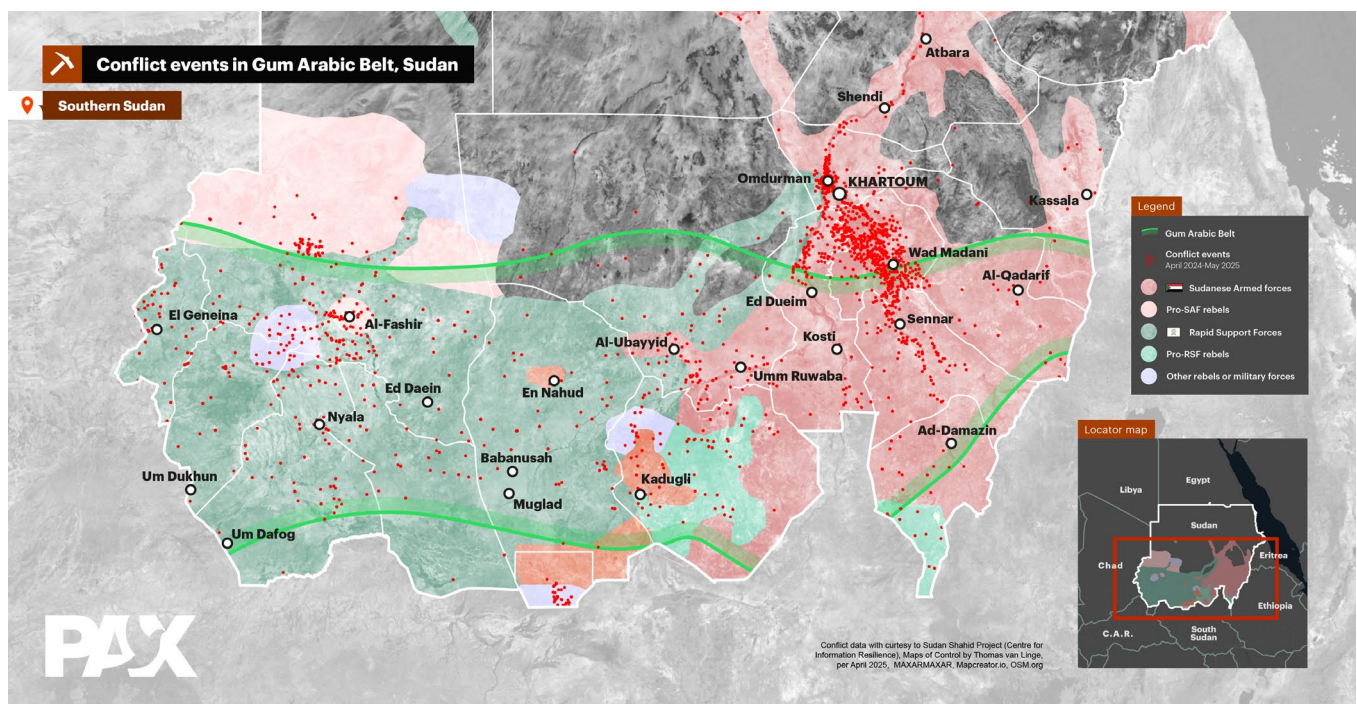
season had been looted by the RSF, with the stolen volume valued at up to USD 125 million. Prices rose sharply amid these disruptions, reinforcing incentives for smuggling and generating major economic losses for producers (*Middle East Eye* 2025). While producers exercised agency in navigating fees and access, they remained highly vulnerable to the consequences of the war, including extortion, market instability, and disrupted livelihoods, with the RSF's control and ongoing conflict shaping both local and regional trade flows.

By mid-2025, these pressures had caused market prices in East Darfur to collapse, prompting some producers to hold back sales or even relocate their families, as new buyers and smuggling networks further distorted local markets (*Darfur24* 2025a; see also, *Le Monde* 2023). Emerging reports from September 2025 indicate that the RSF may have begun formalizing its control over the trade, reportedly blocking exports to neighbouring countries and purchasing some gum arabic stock directly from traders while enforcing stricter border controls (*Darfur24* 2025b).

According to the UN Panel of Experts (2025), cargo volumes reaching RSF-controlled Chadian borders reportedly fluctuated annually between 50,000 and 70,000 tons, while an estimated 30,000–40,000 tons crossed into Libya and Egypt between April and

October 2024. This raises questions about whether these volumes represent unregistered trade, looted stockpiles, or underreported production. Border crossing fees on these routes ranged from USD 2,200 to 3,300 per ton, absorbing a large share of the export value (UN Panel of Experts 2025). Moreover, gum increasingly reached regional markets at discounted prices, mainly because traders could not document to potential buyers that it was conflict-free (interview with trader). Traders in countries such as South Sudan, Chad, and Senegal were reported to offer large volumes at unusually low rates, often without paperwork to verify origin or sustainability. Several buyers reported receiving unsolicited offers via messaging platforms, sometimes quoting prices far below market averages for high-quality gum (*Reuters* 2025).

Taken together, these reports illustrate the transformation of Sudan's gum arabic trade from a regulated export sector into a militarized shadow economy, directly linking the sector to the conflict. It is safe to assume that the RSF profits from looted stockpiles and extortion along trade corridors, while overlapping taxation and smuggling routes create opaque and untraceable supply chains. These findings underscore the risks for international buyers of inadvertently supporting the conflict, highlighting the urgent need for robust due diligence, supply chain verification, and monitoring in conflict-affected regions.



▲ **Figure:** Conflict incidents and control by RSF/SAF in key gum arabic production and trade areas (situation in May 2025).

5. Gum arabic trade in times of war

This section outlines how the conflict has affected Sudan's gum arabic production, export volumes, prices, and regional trade flows — and why this matters for European buyers. Despite severe disruption within Sudan, Europe continues to source significant volumes from both Sudan and its neighbours, meaning that gum arabic linked to RSF-controlled border crossings still reaches EU markets.

Sudan normally produces 70–80% of global gum arabic, exporting 120,000–150,000 metric tons annually before the war. Since the outbreak of conflict, production and export capacity have sharply declined. During the 2023/2024 harvest, only about 40% of normal volumes ($\approx$ 48,000 tons) were shipped. By October 2024, exports were expected to reach 60% of normal levels (72,000–80,000 tons), still far below pre-war volumes (Al-Anan in *Sudan Events 2024*;⁴ UN Panel of Experts 2025).

Local and export prices surged as a result. Hashab rose from 70,000–80,000 SDG per quintal (100 kg) pre-war ($\approx$ USD 35–41 at the time) to around 400,000 SDG ($\approx$ USD 665), while export prices climbed from USD 2,200 to as high as USD 4,000–5,000 per ton. Talha increased from roughly USD 1,200 to USD 1,650–1,700 per ton (*Sudan Events 2024*; UN Panel of Experts 2025; *Wall Street Journal* 2024). Yet farmers often earned less due to insecurity, the withdrawal of trader financing, transport challenges, and predatory taxation—showing a deepening disconnect between rising export prices and farmgate incomes.

Despite disrupted production, gum arabic remained highly valuable. Conflict-related disruptions, including RSF control of key areas, created strong incentives for

⁴ These figures, provided by Ahmed Al-Tayeb Al-Anan, President of the Gum Arabic Exporters Division at the Federation of Chambers of Commerce, reflect the only first-hand estimates identified; exact volumes in conflict-affected areas cannot be independently verified.

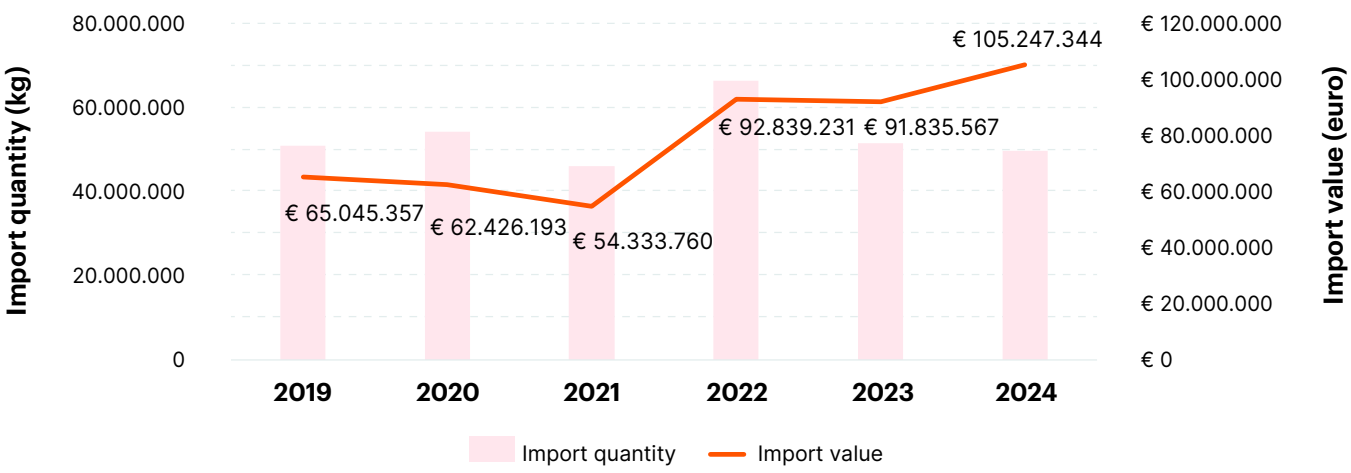
armed actors to seize trade routes and stockpiles. Major European buyers continued sourcing. *Bloomberg's* (2025) analysis of Sayari data, a database tracking international trade and corporate transactions, shows that Nexira imported 3,679 tons between May 2023 and January 2025, including 599 tons from Afritec. Alland & Robert purchased 484 tons from Sudanese companies and 1,161 tons from Chad in 2024 (*Bloomberg* 2025). These examples illustrate that supply chains were maintained even during active conflict.

Regional trade adjustments further stabilized European supply. Eurostat data show that imports from Sudan to the EU and the UK dropped from 66,700 tons in 2022 to 49,900 tons in 2024—a 25% decline—while their value increased from EUR 92.8 million in 2022 to EUR 105.2 million in 2024, reflecting price surges.

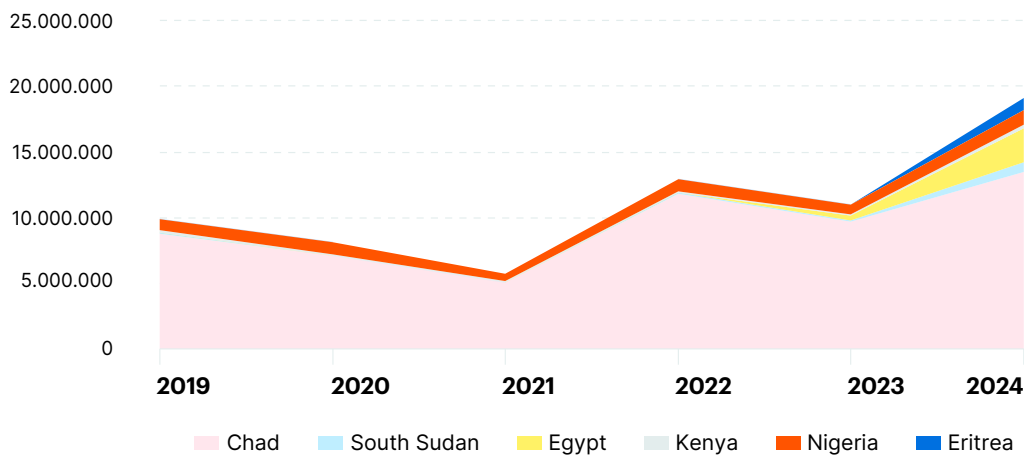
Neighbouring countries partly compensated for these reduced Sudanese volumes, though much of this gum likely originated in Sudan and crossed RSF-controlled

border routes. Imports from Chad rose from 9,700 tons in 2023 to 13,500 tons in 2024, while Egypt (≈2,500 tons), Eritrea (≈900 tons), and South Sudan (≈800 tons) emerged as new exporters. Europe imported about 19,700 tons from neighbouring countries in 2024, compared to 12,200 tons in 2023—a 62% increase. France and Germany were the main destinations.

Taken together, these trends demonstrate that while Sudan's export system and farmer livelihoods have been heavily destabilized by the war, European supply chains have remained intact through a combination of continued Sudanese sourcing and rising re-exports from neighbouring states. Given that much of this gum likely passed through RSF-controlled territories or informal trade routes, European buyers face a heightened risk that their supply chains are linked to the conflict. Robust due diligence is therefore urgently needed to verify origin and ensure conflict-sensitive sourcing.



▲ Figure: EU imports of gum arabic from Sudan, 2019-2024



▲ Figure: EU imports of gum arabic from Sudan's neighbours, 2019-2024

6. “We don’t buy smuggled goods”

European processing companies sourcing gum arabic from Sudan and neighbouring countries have repeatedly emphasized responsible sourcing, traceability, and support for local communities during the ongoing conflict. Yet, considering the evidence presented in previous sections on the trade’s links to conflict in Sudan, it is striking how companies and their branch organization, the Association for International Promotion of Gums (AIPG), have issued statements that appear designed to deflect responsibility.

According to *Bloomberg* (2025), local traders and commercial advisors in Sudan and Chad described the challenges of ensuring compliance on the ground. One commercial advisor for a Sudanese gum factory told *Bloomberg*: “European companies buy looted Sudanese gum smuggled outside of the country. There’s no way to trace it at this point.” A Chadian trader added: “It’s mixed with Chadian gum when it enters the country. We don’t even care if it’s been smuggled. The important thing is that it is properly weighed and you receive your money.” Another exporter observed: “The market is there. But nobody is really asking any questions about how [the gum] leaves the country.”

One Sudanese trader who is now based in Chad told the research team (in May 2025):

“I was in South Sudan and Chad for several years, and the total production here is low, less than 10%. They are not producers (...) Any gum arabic used by these companies originates from Sudan and came to the companies in different ways.”

Moreover, he stated:

“International companies do not buy directly from the RSF. There are merchants in between. The RSF knows nothing about export. They don’t speak foreign languages, so they have others carry out exports for them.”

Similarly, *Reuters'* investigation (2025) found widespread smuggling. Local industry specialists and Sudanese traders told *Reuters*: One specialist said: "Today, the gum in Sudan, I would say all of it is smuggled, because there's no real authority in the country." A Sudanese buyer, speaking anonymously for safety reasons, described being approached by shadowy gum traders; in a WhatsApp conversation reviewed by *Reuters*, a trader outlined trucks carrying gum arabic across Sudanese borders into South Sudan and Egypt. In these cases, the gum traders could not provide certification, and the buyer declined the offers, fearing the gum originated from RSF-affiliated networks.

Despite these realities, the AIPG has repeatedly sought to reassure industry partners that the gum arabic supply chain is not linked to the conflict. In two statements, published on 27 January and 11 March 2025, the association stated that its members "unequivocally condemn any form of smuggling of acacia gum" and reiterated that "there is no reason to assume that there might be any financial links between the AIPG members and the political forces, armies, and militias involved in the current situation." However, when the research team requested an interview about the effects of the war on the supply chain, AIPG declined, explaining that the Secretariat is not "deeply involved in matters concerning the circumstances in the countries of origin, nor the situation in the supply chains," and that regarding Sudan, they "only have knowledge which [is] publicly available through media reports and other accessible sources" (email correspondence, May 2025, on file). This suggests that the international branch of the organization cannot, and has not, verified the origin of the gum entering Europe. The AIPG has published no further statements since.

Individual companies have similarly emphasized compliance and sustainability in public communications. Nexira, which holds roughly 40% of the global gum arabic market, temporarily paused operations in Sudan for several months in 2023 before resuming purchases, citing support for local communities with which it has long worked (*Wall Street Journal* 2024). On its website, Nexira states that "from the production in the Gum Belt to our factory in France, we control the entire supply chain of the acacia gum."

Yet, as reporting from *Bloomberg* and *Reuters* illustrates, this claim contrasts sharply with reality: smuggling and untraceable trade remain widespread, and companies cannot fully verify the origin of the gum they purchase. For instance, Nexira highlights diversified sourcing across multiple countries. Indeed, as the previous chapter shows, international companies have increased their dealings with Chad since the start of the war. However, according to Professor Tariq Al-Sheikh of Kordofan University, most of this gum arabic originates in Sudan and is smuggled into Chad. From there, the gum is also transported to Cameroon and Senegal, where agents of international companies inspect it before purchase.⁵ Another source told the research team that the gum smuggled into Chad is officially registered as having been produced there (interview with gum arabic trader, May 2025).

Moreover, Nexira also mentions the participation in certification schemes such as Sedex and alignment with the UN Global Compact. However, participation in such sustainability initiatives is often voluntary. For instance, Sedex is not a certification scheme but a membership-based platform that helps companies to make their supply chains more ethical and sustainable by offering audits.⁶ Audit reports serve to inform a company and are not available to the public. Moreover, Sedex is designed to help protect workers, but does provide information about companies that are operating in conflict-affected areas.

Alland & Robert has emphasized its commitment to ethical sourcing, condemning smuggling, human rights violations, and other illegal practices in the gum arabic sector. It highlights engagement with sustainability and fair-trade initiatives, including EcoVadis, Fair For Life, and the NGO TRAFFIC's *We Use Wild* initiative (*Bloomberg* 2025; Nexira and Alland & Robert corporate websites, accessed September 2025).

Overall, these accounts demonstrate a persistent gap between corporate statements and on-the-ground realities in conflict-affected sourcing areas. Even where companies participate in sustainability initiatives or adopt risk-mitigation measures, traceability remains extremely difficult to enforce. This contrast highlights the challenges companies face in fulfilling due-diligence obligations in practice.

5 He also said that international agents sometimes require certificates of good standing from sellers, such as a certificate of origin or a Sedex certificate.

6 Sedex (Supplier Ethical Data Exchange) is a platform that allows companies to share, manage, and report information on responsible sourcing practices, covering labour standards, health and safety, environmental performance, and business ethics.

7. Responsible sourcing and due diligence in conflict-affected trade

As previous sections have demonstrated, European importing and processing companies cannot credibly rely on membership in initiatives like EcoVadis, Fair For Life, or TRAFFIC's *We Use Wild* to demonstrate responsible sourcing from Sudan. These schemes focus on general environmental, social, and ethical indicators but do not address the political economy of production and trade in conflict-affected contexts. They fail to assess how revenues are generated, taxed, or diverted under armed control, or the role of military and paramilitary actors in trade. As such, they provide no assurance that sourcing practices are conflict-free or that trade does not contribute to financing hostilities.

In Sudan, both the Rapid Support Forces (RSF) and the Sudanese Armed Forces (SAF) exercise control over production areas and trade routes, imposing levies, “protection” fees, and export charges used to sustain their respective war efforts. The resulting capture and exploitation of the gum arabic sector cannot be meaningfully detected or mitigated through existing sustainability schemes. Companies invoking these frameworks as evidence of due diligence risk obscuring, rather than addressing, how their supply chains intersect with a militarized economy. Voluntary initiatives thus offer limited assurance in conflict-affected settings, underscoring the need for stronger, binding due diligence requirements covering conflict-related risks throughout supply chains.

The discussion below uses France's *Loi de Vigilance* (Vigilance Law), a legally binding due diligence law currently in force, and the example of L'Oréal's gum arabic supply chain as a case in point, since France is both the main importing country for Sudanese gum arabic and the jurisdiction for which the most detailed material is available.⁷ Similar reasoning could apply to other jurisdictions, including Germany, where large downstream companies using gum arabic—such as major food, beverage, and cosmetics manufacturers—

7 Full title: *Loi n° 2017-399 du 27 mars 2017 relative au devoir de vigilance des sociétés mères et des entreprises donneuses d'ordre*. Entered into force on 28 March 2017. The phrase *Loi de Vigilance* is not its official title — it is a widely used shorthand in media, NGO reports, and commentary because the law requires companies to produce a *Plan de Vigilance*.

could be held accountable under the *Lieferkettengesetz*, depending on their size and threshold criteria.⁸

Under current French legislation, Nexira—a French company employing 200–500 people—is not directly subject to the *Loi de Vigilance*, which applies only to companies with more than 5,000 employees in France, or 10,000 globally if headquartered in France. These thresholds determine which companies must prepare and publish annual Vigilance Plans addressing human rights and environmental risks throughout their supply chains. Nexira therefore has no direct legal obligation under this law to conduct full due diligence. However, as a permanent supplier of gum arabic to multinational clients such as L'Oréal, Nexira faces commercial and reputational pressure to demonstrate transparency about its sourcing practices, including the origin of its gum and the measures it takes to manage risks linked to conflict financing or human rights abuses.⁹

By contrast, L'Oréal, a French-headquartered multinational with well over 5,000 employees in France, is directly subject to the *Loi de Vigilance*. The law requires L'Oréal to establish and implement a Vigilance Plan covering the identification, prevention, and mitigation of serious human rights and environmental risks throughout its supply chain—including upstream suppliers where risks are known or reasonably foreseeable.¹⁰ Given that Sudan is a conflict-affected area and credible investigations by *Reuters* and the *Wall Street Journal* have linked gum arabic trade to financing armed militias such as the RSF, L'Oréal has a clear legal duty to investigate these risks. Yet its most recent Vigilance Plan does not mention Sudan, gum arabic, or Nexira, suggesting that it falls short of its obligations (see also, Sherpa 2024).¹¹ L'Oréal should therefore require Nexira to provide traceability information, commission independent verification where necessary, implement risk-mitigation measures, and report publicly on its efforts. Although Nexira itself is not obliged by law, L'Oréal's responsibilities create strong commercial incentives for Nexira to cooperate and enhance transparency.

The gap between L'Oréal's vigilance obligations and its reporting was highlighted during the company's AGM on 29 May 2025, when French activist shareholder

group IPAC (*Initiative Pour un Actionnariat Citoyen*) raised questions about the company's exposure to human-rights risks linked to Sudanese gum arabic.¹² L'Oréal responded that its use of Sudanese gum was *minime* and that ethical concerns had prompted dialogue with suppliers to transition responsibly toward more stable sourcing regions. While L'Oréal frames Sudanese sourcing as negligible, the underlying trade still involves intermediaries like Nexira and Alland & Robert, where some volumes likely include smuggled or conflict-affected gum. This demonstrates that reliance on reassuring statements or voluntary initiatives such as AIPG cannot substitute for legally required due diligence.

Once the EU Corporate Sustainability Due Diligence Directive (CSDDD) enters into force, due diligence requirements for large companies operating in the EU will be harmonised and strengthened. Adopted in 2024 and originally scheduled to apply in phases from 2027, the Directive was set to cover companies with more than 1,000 employees and EUR 450 million in global turnover. It obliges these firms to identify, prevent, and mitigate adverse human rights and environmental impacts across their upstream and part of their downstream value chains. It also obliged companies to take into account the particular risks at play in conflict-affected areas and to adapt their due diligence accordingly. For multinationals such as L'Oréal, the CSDDD would reinforce and deepen obligations already required under France's *Loi de Vigilance*. Mid-sized suppliers such as Nexira are unlikely to meet the thresholds and would therefore not be directly covered but would face indirect contractual pressure from larger buyers subject to the Directive. However, the Directive's scope and timing remain uncertain. Following the European Parliament's November 2025 Omnibus vote, some thresholds and downstream obligations were narrowed, potentially delaying or limiting its practical impact on sectors such as the gum arabic trade.

Taken together, the French example illustrates how binding due diligence laws function in practice: companies with legal obligations must account for risks in conflict-affected sourcing, while their suppliers, even if not directly covered by law, are indirectly pressured

8 The *Lieferkettensorgfaltspflichtengesetz* (LkSG, Supply Chain Due Diligence Act) entered into force on 1 January 2023.

9 This commercial pressure is formalized in instruments such as L'Oréal's *Letter of Mutual Ethical Commitment* with suppliers, although it is unclear to what extent compliance is monitored.

10 This includes upstream suppliers like Nexira and Afritec; notably, the *Loi de Vigilance* has rarely been applied to conflict-affected raw materials, focusing more on human rights risks at the workplace.

11 The absence of Sudan or gum arabic in the Vigilance Plan may reflect either a limitation in the law's scope or in its interpretation by L'Oréal; this remains to be further investigated.

12 See L'Oréal Group response at the May 29, 2025 AGM: "*L'utilisation de gomme arabique du Soudan nous a conduits à dialoguer avec nos fournisseurs et à leur demander de transitionner de manière responsable vers des chaînes d'approvisionnement en gomme arabique durable dans d'autres régions plus stables.*"



▲ **Photo:** Container of E414, an emulsifying additive from gum arabic (source: Shutterstock).

to provide transparency. Germany's *Lieferkettengesetz* operates on similar principles, applying to companies with at least 1,000 employees in Germany. Although German importers of gum arabic may fall below this threshold, larger downstream clients in the food, beverage, or cosmetics industries could still be bound by the law, extending due diligence expectations throughout the supply chain.

Other French multinationals using gum arabic—such as Danone—are also covered by the *Loi de Vigilance* and thus face similar obligations. Examining these cases in detail falls beyond the scope of this paper and could form part of further research into European corporate actors in the gum arabic supply chain.

8. Conclusions and recommendations

Every day, millions of European consumers visit their local grocery stores, unaware that many of the products they buy contain gum sourced from the same region in Sudan where large-scale atrocities are being committed by armed militias. Our research indicates a high probability that these groups profit from the gum arabic trade. This calls for urgent consideration of how the supply chain can be made more transparent and conflict-free, while still ensuring that it remains a vital source of income for the millions of Sudanese who depend on it.

European companies claim that the gum arabic they import is sourced responsibly, yet no independent audit reports or binding legislative commitments substantiate these claims. Interviews with traders, academics, and other experts, together with investigations by the UN, *Bloomberg*, and *Reuters*, indicate a high likelihood that the RSF benefits financially from global demand for Sudanese gum arabic through looting, taxation of transport, and control of trade routes. The international community, including corporate actors, must act to ensure that the ongoing trade does not continue to fund RSF war efforts or genocidal violence.

Current legislation and sustainability initiatives are insufficient for business activity in conflict-affected regions. The Sudanese gum arabic trade illustrates the limits of voluntary schemes: Sedex, EcoVadis, Fair For Life, and TRAFFIC's *We Use Wild* do not address the capture of trade by armed actors, nor the diversion of revenues to finance violence. Companies cannot rely solely on these initiatives to demonstrate responsible sourcing. Similarly, while there is a set of international guidelines regarding responsible business conduct, most notably the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct and the UN Guiding Principles on Business and Human Rights (UNGP's), failure to adhere to these international norms has little to no consequence.

Legal frameworks such as France's Duty of Vigilance Law (*Loi de Vigilance*) and the forthcoming EU Corporate Sustainability Due Diligence Directive (CSDDD) provide a more robust benchmark. Multinationals such as L'Oréal are obliged to identify, prevent, and mitigate serious human rights and environmental risks across their entire supply chains, including upstream suppliers like Nexira and Alland & Robert. Yet public disclosures, including L'Oréal's 2024 Vigilance Plan, appear to reveal gaps in implementation: Sudan and conflict-linked gum arabic are not mentioned, traceability measures are limited, and risk mitigation for upstream suppliers is unclear. These gaps indicate that, without robust legal obligations and independent verification, European companies are unlikely to be able to ensure that Sudanese gum arabic is sourced responsibly or free from conflict financing.

Furthermore, legislative developments indicate a trend in which requirements for corporate actors to fulfil human rights and environmental due diligence obligations are being weakened, if not dismantled entirely. At the EU level, proposals to simplify the original requirements in the Corporate Sustainability Due Diligence Directive (CSDDD) and the Corporate Sustainability Reporting Directive (CSRD) illustrate this trend.¹³ In the Netherlands, the adoption of a national corporate sustainable due diligence law, the *Wet Maatschappelijk Verantwoord Ondernemen* (MVO-wet), proposed by a majority in the Dutch Parliament, was shelved by the conservative-liberal government in 2023.¹⁴ Similarly, one of the first priorities of Germany's newly installed conservative government is to roll back reporting obligations under Germany's national human rights and environmental supply chain due diligence law, which has only taken effect in 2023.

The gum arabic case demonstrates that without robust due diligence obligations, corporate actors can profit from chaotic and poorly governed markets in ways that harm civilian populations. If current proposals to further weaken the EU's CSDDD succeed, the law will not apply to the gum arabic trade, nor to any national legislative proposals. It is therefore crucial that this legislative trend is reversed, and that EU and member state governments create a business environment that requires companies to conduct due diligence, preventing Europe from profiting from a trade that fuels a war economy.

Recommendations

To address these gaps and reduce the risk that the gum arabic trade continues to finance armed actors, we propose a set of recommendations designed to motivate companies to move beyond voluntary assurances, demonstrate compliance with human rights and due diligence laws, and contribute to stabilizing markets while protecting vulnerable producers.

For the EU and EU Member States:

- The European Commission should halt the process of weakening the scope and obligations in the CSDDD and CSRD through the Omnibus proposals.
- EU Member State governments should strongly advocate at the EU level to maintain the scope initially proposed in the 2024 CSDDD text.
- Both the European Commission and EU Member States should ensure that EU and national corporate sustainable due diligence legislation includes a requirement to conduct *heightened due diligence* in conflict-affected and high-risk areas (CAHRAs), such as Sudan, where there is an increased likelihood of severe human rights and environmental abuses.
- The Dutch government should re-start the legislative process for the adoption of the national MVO-wet, as proposed by Parliament in 2023.

For NGOs:

- Continue advocating for more rigorous due diligence legislation, at both EU and national levels, extending beyond first-tier due diligence and applying to the entire supply chain, using the gum arabic case as an example.
- Advocate for companies to conduct heightened due diligence in CAHRAs.
- Obtain disclosure of supplier information and conflict-risk data to improve transparency.

¹³ Whereas the initial CSDDD text applied a due diligence requirement to companies with more than 1,000 employees and EUR 450 million in net turnover, the Omnibus I simplification proposals raise the threshold to 5,000 employees and EUR 1.5 billion. Second, under the new text, the requirement applies only to first tier (direct) suppliers, whereas the original text covered the entire supply chain.

¹⁴ The government shelved the initiative due to concerns over the act's potential negative impact on the Netherlands' business climate and stated that it would wait for the adoption of the CSDDD.

For Corporate Actors:

- Do not wait for European or national legislation; ensure business practices align with international norms, including the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct and the UN Guiding Principles on Business and Human Rights (UNGPs).
- Trace gum arabic fully from Sudanese producers to European importers, with regular public reporting.
- Commission independent audits and conflict-risk assessments to detect extortion, smuggling, or armed control along the supply chain.
- Enforce binding supplier agreements that prohibit sourcing from militarized areas, with clear corrective measures for violations.
- Conduct heightened due diligence in CAHRAs, where there is an increased likelihood of severe human rights and environmental abuses.
- Work with civil society and local communities to ensure policies reflect local realities and protect producer livelihoods.
- Align operations proactively with current and upcoming legal obligations, anticipating CSDDD requirements.
- Monitor conflict risks continuously and adapt sourcing to prevent revenues from funding armed groups.

Due to budget and time limitations, and the ongoing civil war in Sudan, the research team was unable to conduct field research. However, as the violence in Sudan continues, further research is vital. This is particularly urgent given the expected substantial increase in global demand for gum arabic in the coming years, driven by consumer interest in natural ingredients, especially in the food and beverage, pharmaceutical, and cosmetics industries.¹⁵

¹⁵ *Coherent Market Insights (2025)* values the gum arabic market in 2025 at USD 485 million and expects the market to grow by 6,1% year on year up to USD 734 million in 2032.

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Colophon

November 2025

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Cover image: Sudanese man harvesting gum arabic resin,
North Kordofan (source: Ashraf Shazly / AFP).

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